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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)
Investigation by the Department of Telecommunications)
and Energy on its own motion pursuant to)
G.L.c. 159, §§ 12 and 16, into Verizon New England) D.T.E. 01-34
d/b/a Verizon Massachusetts' provision of Special)
Access Services)

)

PETITION OF CTC COMMUNICATIONS, CORPORATION and XO MASSACHUSETTS, INC. FOR LEAVE TO INTERVENE

Pursuant to 220 CMR § 1.03(1) of the Rules of Practice and Procedure of the Department of Telecommunications and Energy ("Department"), CTC COMMUNICATIONS, CORPORATION and XO MASSACHUSETTS, INC. (the "Joint Petitioners") by the undersigned counsel, hereby petition for leave to intervene as a party in this docket. In support of this petition, the Joint Petitioners state as follows:

1. CTC Communications, Corporation ("CTC"), with its principal place of business at 220 Bear Hill Road, Waltham, MA 02451 is a CLEC, authorized to provide, and currently providing, local exchange services in Massachusetts.
2. XO Massachusetts, Inc., with a principal place of business at 1505 Farm Credit Drive, McLean, Virginia 22102, is a CLEC, authorized to provide, and currently providing, local exchange services in Massachusetts.
3. The Joint Petitioners wish to intervene for the purpose of participating fully in this proceeding by presenting evidence and testimony, comments, and briefs, as appropriate.
4. Because the Joint Petitioners rely or will be relying on Verizon's provision of special access services to provide services to their own customers, this proceeding is of critical importance to the Joint Petitioners. This proceeding, through its determination of (1) whether Verizon's special access services are unreasonable

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under G.L. c. 159 s. 16; and (2) if so, what steps Verizon should be required to take to improve its special access services, will have a direct and substantial impact on the Joint Petitioners' business operations. As CLECs that order such services from Verizon, Joint Petitioners have significant experience with Verizon's performance in provisioning such services and can make significant contributions to the Department's review of such matters.

5. Each of the Joint Petitioners' rights will be substantially and specifically affected by the outcome of this proceeding. Therefore, their interests cannot be adequately represented without the Department granting this petition.

6. The names and addresses of the individuals to receive documents and communications regarding this proceeding are:

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WHEREFORE, for the foregoing reasons, CTC Communications, Corporation and XO Massachusetts, Inc. each request that it be granted leave to intervene as a party in this proceeding.

Respectfully submitted,

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CTC COMMUNICATIONS, CORP.

XO MASSACHUSETTS, INC.

By Their Counsel

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